

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

IN RE:
KENNETH J. SAMANSKY §
xxx-xx-8594 §
3001 N. TRINITY §
DENTON, TX 76208 §
§
§
§
§
CASE NO. 13-41306
CHAPTER 13

Debtor

MOTION FOR APPROVAL OF POST-PETITION ADMINISTRATIVE FEE

TO THE HONORABLE JUDGE OF SAID COURT:

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REQUESTS FOR HEARING. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

COMES NOW, Barron and Barron, L.L.P., by and through Robert E. Barron, attorney of record in the above-styled bankruptcy case and herewith files this Motion for Approval of Post-Petition Administrative Fee and in support would show the Court as follows:

1. Kenneth J. Samansky, Debtor, filed a Chapter 13 bankruptcy on May 22, 2013.
2. On June 12, 2014, the Debtor retained Barron and Barron, L.L.P. to file a Motion to Sell Real Estate. The agreed upon fixed fee was \$650.00. Barron and Barron, L.L.P. received said fee which was placed in a trust account pending approval by the Court.
3. For this fixed fee, Barron and Barron, L.L.P. will prepare and file a Motion to Sell Real Estate, prepare and file a Witness and Exhibit List, and prepare and file a Motion for

Approval of Post-Petition Administrative Fee. In addition, the fixed fee includes letter and/or telephone conferences with the Debtor(s) regarding Debtor(s) position, reviewing the Debtors' records, reviewing the creditor's records, telephone conferences with the creditor and/or their attorneys, reviewing possible settlement, reviewing the agreed order, and possible trial if a settlement can not be reached.

4. Since Barron and Barron, L.L.P. has or will shortly substantially complete all of the legal services required for the Motion to Sell Real Estate, Barron and Barron, L.L.P. seeks approval to withdraw the post-petition administrative fee from the trust account.

WHEREFORE, PREMISES CONSIDERED, Barron and Barron, L.L.P., respectfully prays that this Court approve the Motion for Approval of Post-Petition Administrative Fee and for such other and further relief, both general and specific, at law or in equity, to which the Debtor may show justly entitled.

Dated: July 23, 2014

Respectfully submitted,

BARRON AND BARRON, L.L.P.
P.O. Box 1347
Nederland, TX 77627
409-727-0073

By: /s/ Robert E. Barron
Robert E. Barron
SBN: 01820800
Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2014, a true and correct copy of the Motion for Approval of Post-Petition Administrative Fee shall be served via electronic means, if available, otherwise by regular, first class mail, to the following, and to the parties on the attached mailing matrix. This service complies with Local Rules of Bankruptcy Procedure 9013(f).

Kenneth J. Samansky
P.O. Box 1551
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Janna L. Countryman
P. O. Box 941166
Plano, TX 75094-1166

Bank of America, N.A.
c/o Chelsea Marie Schneider
14160 North Dallas Parkway, Suite 900
Dallas, TX 75254

Toyota Motor Credit Corporation
c/o Stephen G. Wilcox
P.O. Box 11509
Fort Worth, TX 76110-0509

US Trustee
Office of the U.S. Trustee
110 N. College Ave., Suite 300
Tyler, TX 75702

/s/ Robert E. Barron
ROBERT E. BARRON

Case 13-41306 Doc 59 Filed 07/23/14 Entered 07/23/14 11:11:44 Desc Main
Label Matrix for local noticing Document Page 5 of 8 AT & T
0540-4
Case 13-41306
Eastern District of Texas
Sherman
Wed Jul 23 11:06:19 CDT 2014

Ace Cash
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Dallas, TX 75240-3848
Affiliated Pathologists
POB 1867
Denton, TX 76202-1867
Affiliated Pathologists
c/o Credit Systems
POB 1088
Arlington, TX 76004-1088

Asset Acceptance
POB 1630
Warren, MI 48090-1630
Atmos Energy
P.O. Box 790311
Saint Louis, MO 63179-0311
Bank of America
7105 Corporate Dr.
Plano, TX 75024-4100

Bank of America, N.A.
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Baylor Medical Center
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95 Argonaut #280
Aliso Viejo, CA 92656-4140

Baylor Medical Ctr
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Dallas, TX 75395-1970
Baylor Medical Ctr.
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800 E. Campbell #399
Richardson, TX 75081-1862
Baylor Medical-Carrollton
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Dallas, TX 75374-0933

Big D Lumber
301 S. Interurban St.
Richardson, TX 75081-4183
Bluegreen Corp
4960 Conference Way
Boca Raton, FL 33431-4413
COSERV
C/O Credit Systems Intl.
1277 Country Club Ln.
Fort Worth, TX 76112-2304

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SALT LAKE CITY UT 84130-0285
Calvary Portfolio Services
500 Summit Lake Drive, Ste 400
Valhalla, NY 10595-2322
Central Financial Control
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Anaheim, CA 92816-6051

Chase
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Wilmington, DE 19850-5298
Chase
c/o Midland Funding
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San Diego, CA 92123-2255
Chase
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Cheektowaga, NY 14225-1943

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Jacksonville, FL 32256-7412

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Killeen, TX 76540-0937

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10771 Estate Ln.
Dallas, TX 75238-2338

HSBC
P.O. Box 5253
Carol Stream, IL 60197-5253

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2650 Fountain View Dr.
Houston, TX 77057-7631

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c/o LTD Fiancial
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Houston, TX 77074-2010

Home Pro
1325 Capital Pkwy. Ste 117
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Burlington, NC 27216-2240

Maryland National Bank
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Baltimore, MD 21202-3504

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Allen, TX 75013-0016

Medical Center of Lewisville
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Austin, TX 78720-3500

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DALLAS TX 75265-0393

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POB 957
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Texas Workforce Commission
101 E. 15th St.
Austin, TX 78778-0001

Title Max
501 N. Interstate 35E Frontage Rd
Denton, TX 76206

Touchstone of Oaktree
1435 S. Loop 288 #101
Denton, TX 76205-4701

Touchstone of Oaktree
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5754 W. 11th Ste 100
Greeley, CO 80634-4811

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PO BOX 8026
CEDAR RAPIDS IA 52408-8026

Toyota Motor Credit Corporation (TMCC)
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Cedar Rapids, Iowa 52408-8026

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Wells Fargo Bank N A
Wells Fargo Education Financial Services
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West Asset Management
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One
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Discover
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Internal Revenue Service
POB 21126
Philadelphia, PA 19114

Portfolio Recovery Associates, LLC
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Norfolk VA 23541

TXU Energy
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(d)TXU Energy
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Dallas, TX 75265

Toyota Financial Services
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Carol Stream, IL 60197

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Bank of America, N.A.

(d)Janna L. Countryman
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Plano, TX 75094-1166

(u)Toyota Motor Credit Corporation

End of Label Matrix	
Mailable recipients	87
Bypassed recipients	3
Total	90